

United States v. Shacar
21-cr-30028-MGM
EXHIBIT “C”

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AUSA Alex Grant
United States Attorneys Office
Springfield, MA. 01103

Re: Benjamin Shacar, NO. 21-30028
DISCOVERY LETTER

Dear AUSA Grant:

I am requesting the following discovery in the above named case:

1. Information regarding the FLA mentioned in the Search Warrant Affidavit including but not limited to:
 - a. The identification of the FLA that provided the tip including location and name.
 - b. The investigative technique used by the FLA to obtain the IP address of the defendant and to link it to Target Websites.
 - c. Whether there was more than 1 FLA involved in the investigation and if so, the identification of all FLAs involved.
2. The substance of the notification by the FLA to U.S. law enforcement regarding the identification of the IP address in this case including but not limited to:
 - a. The author of the Fla notification.
 - b. The identity of the U.S. Law Enforcement agency that received the notification.
 - c. The complete content of the notification.
 - d. Any and all descriptions of the Target Websites and intermediate websites provided by the FLA.
 - e. Any and all correspondence relative to the tip and or notification provided by the FLA(s).
3. Any information and documentation addressing whether the FLA provided the information regarding the IP address in this case as part of a coordinated initiative or program with U.S. Law enforcement.
4. Any and all information relative to the determination that the defendant's IP address accessed or visited certain targeted websites including but not limited to:
 - a. The number of tips provided.
 - b. The manner in which the IP address in this case was identified including techniques used.

- c. The number of websites identified.
- d. The number of IP addresses identified.

In support of this request, I cite to paragraph 34 of the Search Warrant affidavit in which it states that the FLA provided the IP address in this case to US law enforcement without accessing, searching or seizing any computer in the US. Further, according to the affidavit no US law enforcement agency participated in the investigative work through which the IP address was identified.

Sincerely yours,

Elaine Pourinski

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